Pesticides

In the 1960s, Agent Orange was applied on Kenai National Wildlife Refuge for moose browse improvement.

Historically, pesticides have been used on the refuge to eradicate spruce and tall deciduous trees for moose browse improvement and to prevent fence posts from rotting. Some of the pesticides applied on the refuge were dybar, 2,4-dichlorophenoxyacetic acid (2,4-D), 2,4,5-trichlorophenoxyacetic acid (2,4,5-T) and pentachlorophenol (PCP), all of which will be discussed in further detail in this section. The chemical abstract (CAS) numbers, synonyms, physical/chemical properties, environmental fate characteristics and toxicological effects for each chemical discussed in this section are located in Appendix G.

The first mention of pesticide use on the refuge occurs in the May-August 1954 Narrative, which states:

A Federal Aid Project was started to test the value of various herbicides in eradicating spruce and tall deciduous trees for range improvement. Plots were treated by ground sprays on a plot adjacent to the control burn plot on Slikok Lake and in the Chickaloon Bay area. A plot was treated by aerial spraying in the Chickaloon Bay area. Observations on these plots for the season are not yet complete. (page 6)

This is the only information the May-August 1954 Narrative provides. It does not contain specific information concerning which herbicides were used, the amounts applied or the exact locations of

Although, the Annual Narratives provide some information about historic pesticide use on the refuge, they may not detail all pesticide uses on the refuge. In fact, the next mention of pesticide use does not occur until 1959.

All known pesticide application events on the refuge, as documented in the Annual Narratives, are listed in Table 1. The narratives did not provide exact application locations in many instances.

Dybar

Dybar (fenuron) was applied at certain locations on the refuge for moose browse improvement in 1959 and 1961 (Table 1). Dybar readily biodegrades in terrestrial environments, with a halflife of approximately two to five months depending on ambient temperature. In aquatic environments, dybar also will biodegrade readily. Additionally, dybar will not bioconcentrate in aquatic organisms. Because dybar was applied on the refuge several decades ago and it rapidly biodegrades in the environment, residual dybar contamination is likely not an issue for the refuge

Table 1. Pesticides Applied on Kenai National Wildlife Refuge as Documented in the Annual Narratives.

Pesticide(s)	CAS#	$Dates\ Applied$	$Application \ Rate$	$Application\ Location$
Dybar	101-42-8	June 1959	Unknown	4 test plots
Dybar	101-42-8	April 12, 13 and 19, 1961	10 to 80 pounds/acre (pellet form)	31 plots, 1/10 acre each in 6 cover types*
2,4-D and 2,4,5-T used separately and in mixtures	94-75-7 and 93-76-5	June 1964	Various**	24 plots, 1/100 acre in the Naptowne area
50:50 ratio of 2,4-D and 2,4,5-T (Agent Orange)	94-75-7 and 93-76-5	June 15, 1966	4 pounds/acre in a mixture of 30 gallons of water (aerially sprayed)	10 acre plot directly south of Grus Lake, north of Swanson River

^{*}More information regarding location, cover types treated and treatment results is contained in Appendix H.

Dioxin is recognized by the National Toxicology Program as a "known human carcinogen."

There are 75 polychlorinated dibenzo-p-dioxin (PCDD) congeners and 135 polychlorinated dibenzofuran (PCDF) congeners; the number of chlorine atoms can vary from one to eight. The toxicity of PCDD/PCDF compounds is related to chlorine atoms occupying the 2,3,7 and 8 positions.

2,3,7,8-tetrachlorodibenzop-dioxin (2,3,7,8-TCDD) and
2,3,7,8-tetrachlorodibenzofuran
(2,3,7,8-TCDF) are considered
extremely toxic. 2,3,7,8-TCDD
is often called dioxin, even
though 2,3,7,8-TCDD is just
one of the 75 dioxin congeners.
2,3,7,8-TCDD will be called
dioxin or TCDD throughout
this document. The plural
term "dioxins" will be used
when referring to more than
one dioxin congener.

2.4-D. 2.4.5-T and Dioxin

The first mention of 2,4-D and 2,4,5-T use occurs in the January-April 1963 Narrative. Apparently 2,4-D and 2,4,5-T were ordered for brush control use during the summer of 1963. However, the narrative does not expand on if and where the chemicals were applied that year. The known application dates, locations and application rates for 2,4-D and 2,4,5-T are listed in Table 1.

The application of 2,4-D and 2,4,5-T has generated considerable controversy due to their extensive use as a defoliant in the Vietnam War. During the war, the U.S. military called a 50:50 mixture of 2,4-D and 2,4,5-T, "Agent Orange," due to the orange stripes on drums which contained this 50:50 mixture.

One major concern with 2,4,5-T is contamination with 2,3,7,8-tetrachlorodibenzo-p-dioxin (dioxin or TCDD). Dioxins are a byproduct of 2,4,5-T manufacturing. The TCDD contamination in Agent Orange ranged from 1.77 to 40 ppm (Moore, http://dns.advnet.net/gdmoore/aotalk1.htm). Dioxin is thought to cause a variety of human health effects and is categorized by the International Agency for Research on Cancer (part of the World Health Organization) as a human carcinogen. Dioxin is also recognized by the National Toxicology Program as a "known human carcinogen." Additionally, dioxin may bioconcentrate in aquatic organisms and is suspected to cause reproductive toxicity in some wildlife species. In 1985, use of 2,4,5-T was banned in the United States due to concerns about dioxin contamination.

Pentachlorophenol

The refuge narratives never detailed any use of PCP on the refuge, and it was not until a 1991 refuge-wide inventory of potentially contaminated sites that PCP contamination was discovered (ADEC spill number 94-23-09-096-02).

PCP was used on the refuge in the 1960s and 1970s to treat fence posts during construction of perimeter fencing for the Moose Research Center, a cooperative moose research effort between USFWS and the Alaska Department of Fish and Game. Precut

^{**}More information regarding this application and treatment results is contained in Appendix I.



Site investigation for pentachlorophenol contamination at the Moose Research Center. USFWS Photo by James E. Frates.

spruce posts were soaked in a mixture of PCP and diesel fuel to prevent the poles from eventually rotting. Prior to being placed in the ground, the butt ends of the poles were soaked in sealed concrete culverts for several days. The treatment location is known as the Swan Lake 1 exploratory well drill site (an abandoned oil well pad drilled in 1961).

The release of PCP and diesel range organics (DRO) at the site occurred from spillage, overflow and drip-drying activities. There are no records to indicate how many culverts were used, how many posts were treated or how much PCP was applied. Soils at the site had PCP concentrations up to 300 ppm. Concrete culverts had PCP concentrations from 3 to 450 ppm. Dioxins and furans were also detected at the site, but TCDD was not one of the dioxins detected.

Currently, the use of PCP is restricted in the United States. Like 2,4,5-T, PCP also is infamous for containing dioxins. PCP contains a wide variety of dioxins (virtually every possible isomer) with the higher chlorinated congeners predominating. The concentration of total dioxins in PCP is in the mid-to-high ppm range, and the primary dioxin congener in PCP is octachlorodibenzo-p-dioxin, which is about as toxic as table salt (Shadoff, http://www.geocities.com/Athens/1309/ d_where2.html).

Cleanup plans were initiated in 1993, and debris and several culverts were removed from the site. In April 1988, ADEC determined the site required no further action. However, according to the ADEC, both DRO and PCP subsurface contamination remain at levels which may pose a human/ecological health risk. To alleviate possible risks, the ADEC mandated the following institutional controls:

1) site access by unauthorized individuals will be restricted by a locked gate

- 2) the site will not be developed other than to be used as a temporary storage area
- 3) no groundwater well will be installed at the site; and
- 4) no activity that may disturb subsurface soils may occur.

Summary: Pesticides

Currently, no pesticides are used on the refuge, and any pesticide use must first be approved by the Pesticide Coordinator at the USFWS Regional Office in Anchorage, Alaska.

Although several pesticides were applied at the refuge, it is possible that these chemicals have degraded over the years and no longer pose contamination threats. One concern, however, is the persistence of dioxin in the environment. Dioxin is considered resistant to biodegradation, and half-lives in soil interiors are estimated at 12 years (http://www.speclab.com/ compound/c1746016.htm) and perhaps longer in colder climates, like Alaska. Dioxin contamination could still be an issue in areas where 2,4,5-T was applied.

Formerly Used Defense Sites

Some military activities have occurred on or near the refuge. This section contains a description of known Formerly Used Defense Sites (FUDS), known military activities and a discussion of potential contamination issues.

Skilak Military Recreation Site

The Skilak Military Recreation site was located on the refuge 1/4 to 1/3 mile downstream of the outlet of Skilak Lake on the north side of the Kenai River (star indicates approximate location, Figure 5). This site was used by the military as a recreation area in the 1940s and was transferred to the USFWS in 1954. Prior to 1988, over 70 empty drums were removed from the site and several extremely rusted barrels still remain at this location. To date, this site has not been tested for contamination. Considering the area's history and the large number of barrels removed from this site, a contaminants investigation by the U.S. Army Corps of Engineers FUDS program may be warranted.

Skilak Lake

Figure 5. Approximate Location of the Skilak Military Recreation Site.

U.S. Geological Survey. Kenai (B-2) Quadrangle, Alaska-Kenai Peninsula Borough, 1:63 360 Series (Topographic).

Naptowne Radio Relay Site

The 19.5-acre Naptowne Radio Relay Site is located on the north side of the Sterling Highway at milepost 78.1. The U.S. Air Force established this site in 1955 for a microwave radio relay station as part of the White Alice Communications System (WACS). The site contained a power and equipment building, steel tower, warehouse, sanitary latrine, fuel storage tanks, chain link fence and access road. Additionally, gravel removal occurred at the site. The Air Force had a special use permit issued by the USFWS for this site until September 1982. In November 1983, Alascom, Inc. took over the site from the Air Force, and Alascom was issued a special use permit by USFWS. Alascom is the current operator of this site.

Many WACS sites in Alaska are known to be contaminated. Because this was a WACS site, potential contamination issues could exist, especially if PCBs were used in conjunction with power generation. In December 1987 and January 1988, Alascom's contractor reported

finding no evidence of hazardous/toxic waste, ordnance or unsafe debris. It is unclear how detailed of an assessment occurred at this site, and a reevaluation of possible contaminants and sampling by the U.S. Army Corps of Engineers FUDS program may be warranted.

Turnagain Arm Firing Range

In 1955, the Department of the Army established the 47,864-acre Turnagain Arm Firing Range, which was to be utilized as an anti-aircraft artillery firing range. The site was located in Southcentral Alaska approximately six miles south of downtown Anchorage on both sides of the Turnagain Arm; 99% of this site was located on what is now the KNWR. However, in 1957 the Army decided not to develop the firing range, and all available information indicates the site was never used for its intended purpose.

According to Rick Johnston, a Ranger and Pilot for the refuge, in 1990 approximately 8 to 15 barrels were observed in an open meadow in Chickaloon Flats, south of Chickaloon Bay and West of Chickaloon River. These barrels were located within the proposed Turnagain Arm Firing Range. The exact location of the barrels was not recorded, and the barrels were never sighted again. Johnston thought the barrels probably belonged to the military.

Wildwood Station

The Wildwood Station was an Army base located 3.5 miles north of the city of Kenai, approximately 3 miles west of the refuge boundary (Figure 6, arrow pointing toward Wildwood). It was constructed and used as a communications station by the Army in 1953. On December 31, 1965, this site was activated as Wildwood Air Force Station and was closed on July 1, 1972. The site comprised 5,300 acres, with military construction on 70 acres. The site included three aboveground fuel tanks, 12 underground fuel tanks, various structures and three abandoned landfills.

In the late 1980s, studies were initiated at Wildwood to determine potential contaminants and contaminated areas. The primary contaminants of concern were determined to be fuels and lead; however, other contaminants such as PCBs, dioxins, dichlorobenzenes, methoxychlor, endrin, BTX, dichlorodiphenyltrichloroethane (DDT) and chlordane were also discovered at the site. Since 1993, many cleanup actions have occurred. According to Jim Baker, Engineering Manager for the U.S. Army Corps of Engineers, no contamination is migrating toward the refuge (pers. comm.).

Other Military Activities

Historically, the refuge was used for military maneuvers, but the full extent of past military maneuvers on the refuge is unknown. One such event is documented in the January-April, 1959 Refuge Narrative:

Some two hundred men of the 1st Battalion, 23rd Infantry, from Fort Richardson, Alaska, conducted maneuvers on the Range March 26 and 27. From a point of helicopter landing on the

Figure 6. Approximate Location of Wildwood Station.



U.S. Geological Survey. Kenai (C-4) Quadrangle, Alaska-Kenai Peninsula Borough, 1:63 360 Series (Topographic).